

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA :

- against - :

SABIRHAN HASANOFF, et al., :

Defendant. :

X

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED 3/30/11
S4 10 Cr. 162 (KMW)

MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

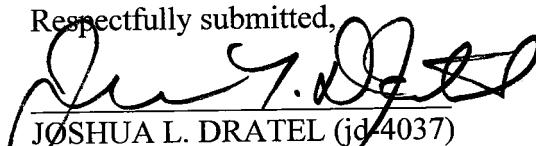
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Joshua L. Dratel, Esq., a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*
of

Applicant's Name: Ahmed Ghappour
Firm Name: The Law Offices of Ahmed Ghappour
Address: P.O. Box 20367
City/State/Zip: Seattle, WA 98102
Telephone Number: (415) 598-8605
Email Address: aghappour@gmail.com

who is a member in good standing of the Bar of the State of California, and of the Bar of the
State of Washington. There are no pending disciplinary proceeding against Ahmed Ghappour, in
any State or Federal court.

Dated: 25 March 2011
New York, New York

Respectfully submitted,


JOSHUA L. DRATEL (jd4037)
Law Offices of Joshua L. Dratel, P.C.
2 Wall St., 3rd Floor
New York, New York 10005
(212) 732-0707

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	S4 10 Cr. 162 (KMW)
- against -	:	DECLARATION IN
SABIRHAN HASANOFF, et al.,	:	SUPPORT OF DEFENDANT'S
Defendant.	:	MOTION TO ADMIT
		AHMED GHAPPOUR, ESQ., AS
		<u>COUNSEL PRO HAC VICE</u>

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STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

Joshua L. Dratel, Esq., pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am an attorney at Law Offices of Joshua L. Dratel, P.C., counsel for Defendant Sabirhan Hasanoff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Ahmed Ghappour, Esq., as counsel *pro hac vice* to represent Defendant Sabirhan Hasanoff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 22, 1982. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Ahmed Ghappour since November 2009.
4. Mr. Ghappour is an attorney at the Law Offices of Ahmed Ghappour, in Seattle, Washington.

5. I have found Mr. Ghappour to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Criminal and Civil Procedure and the Local Rules of this Court.

6. Accordingly, I am pleased to move for the admission of Ahmed Ghappour, *pro hac vice*.

7. Attached hereto as Exhibit 1 are true and original certificates of good standing for Ahmed Ghappour, from the states of California and Washington, both issued within 30 days and where Mr. Ghappour is a member in good standing.

8. I respectfully submit a proposed order granting the admission of Ahmed Ghappour, *pro hac vice*, which is attached hereto as Exhibit 2.

WHEREFORE it is respectfully requested that the motion to admit Ahmed Ghappour, *pro hac vice*, to represent Defendant Sabirhan Hasanoff in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed March 25, 2011



JOSHUA L. DRATEL



**THE STATE BAR
OF CALIFORNIA**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

MEMBER SERVICES CENTER

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

March 7, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, AHMED GHAPPOUR, #255723 was admitted to the practice of law in this state by the Supreme Court of California on May 22, 2008; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)
OF) BAR NO. 42803
AHMED GHAPPOUR)
TO PRACTICE IN THE COURTS OF THIS STATE)
)
)

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

AHMED GHAPPOUR

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on September 17, 2010, and is now and has continuously since that date been an attorney in good standing, with a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 7th day of March, 2011.

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter". The signature is fluid and cursive, with some loops and variations in line thickness.

Ronald R. Carpenter
Supreme Court Clerk
Washington State Supreme Court

USDS SDNY
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DATE FILED: <u>3/29/11</u>

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA : S4 10 Cr. 162 (KMW)
 - against - : ORDER FOR ADMISSION
 PRO HAC VICE
 SABIRHAN HASANOFF, et al., : ON WRITTEN MOTION
 Defendant. :
 X

Upon the motion of Joshua L. Dratel attorney for Defendant Sabirhan Hasanoff and said
 sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Ahmed Ghappour
 Firm Name: The Law Offices of Ahmed Ghappour
 Address: P.O. Box 20367
 City/State/Zip: Seattle, WA 98102
 Telephone Number: (415) 598-8605
 Email Address: aghappour@gmail.com

is admitted to practice *pro hac vice* as counsel for Sabirhan Hasanoff in the above-captioned case
 in the United States District Court for the Southern District of New York. All attorneys
 appearing before this Court are subject to the Local Rules of this Court, including the Rules
 governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF)
 system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel
 shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: 28 March 2011
 New York, New York

Kimberly M. Wood
 The Honorable Kimba M. Wood
 United States District Judge

AFFIRMATION OF SERVICE

LINDSAY A. LEWIS, pursuant to Title 28, United States Code, Section 1746, hereby declares under the penalty of perjury, that she is an attorney at the Law Offices of Joshua L. Dratel, P.C., and that, on March 24, 2011, she caused copies of this MOTION TO ADMIT COUNSEL *PRO HAC VICE*, to be served by e-mail on:

Brendan R. McGuire
John P. Cronan
Aimee Hector
*Assistant United States Attorneys for the
Southern District of New York*
Tel.: (212) 637-2220/2779/2203

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Attorney for Wesam El-Hanafi

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New York, New York 10016
Tel.: (212) 257-6455
jharris@colsonharris.com
Attorney for Wesam El-Hanafi

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 25 March 2011
New York, New York



LINDSAY A. LEWIS